

**NATIONAL CENTER ON
SEXUAL EXPLOITATION**

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANGELA WILLIAMS; JANE DOE #1; JANE
DOE #2,

Plaintiffs,

vs.

STEVE SISOLAK, Governor of Nevada, in his
official capacity; AARON FORD, Attorney
General of Nevada, in his official capacity; THE
CITY OF LAS VEGAS; CLARK COUNTY;
NYE COUNTY; WESTERN BEST, INC.
D/B/A CHICKEN RANCH; WESTERN BEST
LLC; JAMAL RASHID; MALLY MALL
MUSIC, LLC; FUTURE MUSIC, LLC; PF
SOCIAL MEDIA MANAGEMENT, LLC; E.P.
SANCTUARY; BLU MAGIC MUSIC, LLC;
EXCLUSIVE BEAUTY LOUNGE LLC;
FIRST INVESTMENT PROPERTY LLC;
V.I.P. ENTERTAINMENT, LLC; MP3
PRODUCTIONS, INC.; MMM
PRODUCTIONS, INC.; SHAC, LLC D/B/A
SAPPHIRE GENTLEMAN'S CLUB AND/OR
SAPPHIRE; SHAC MT, LLC; and LAS
VEGAS BISTRO, LLC D/B/A LARRY
FLYNT'S HUSTLER CLUB;

Defendants.

Case No.: 2:21-cv-01676-APG-VCF

**JOINT STIPULATION AND
ORDER FOR EXTENSION
OF TIME FOR
PLAINTIFFS TO RESPOND TO
SHAC, LLC D/B/A
SAPPHIRE GENTLEMAN'S CLUB
AND SHAC MT, LLC'S MOTION TO
COMPEL ARBITRATION
[ECF NO. 257] AND PLAINTIFFS'
NOTICE OF WITHDRAWAL OF
MOTION TO STRIKE [ECF NO. 267]**

1 COMES NOW Plaintiffs Angela Williams, Jane Doe #1, and Jane Doe #2
2 (“Plaintiffs”), by and through their counsel of record, Guinasso Law, Ltd. and the National
3 Center on Sexual Exploitation, and Defendants SHAC, LLC d/b/a Sapphire Gentlemen’s
4 Club, and SHAC, MT, LLC (“Defendants”), by and through their counsel of record Womble
5 Bond Dickinson (US) LLP and Wallace & Allen, LLP, hereby stipulate and agree to the
6 following regarding Defendants’ Motion to Compel Arbitration filed on January 30, 2025
7 [ECF No. 257]:

- 8 1. This is the first stipulation for extension of time to file a response to
9 Defendants’ Motion to Compel Arbitration filed on January 30, 2025 [ECF No.
10 257];
- 11 2. Plaintiffs have a two-week extension to file an opposition to Defendants’
12 Motion to Compel Arbitration filed on January 30, 2025 [ECF No. 257],
13 extending their deadline to respond to February 27, 2025;
- 14 3. Defendants have a two-week extension to file their reply to Plaintiffs’
15 opposition to their Motion to Compel Arbitration, extending their deadline to
16 reply to March 6, 2025; and
- 17 4. Having received the unredacted documents at issue, Plaintiffs withdraw their
18 Motion to Strike Defendants’ Motion to Compel Arbitration filed on February
19 7, 2025 [ECF No. 267].

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21 **IT IS SO STIPULATED.**
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1 DATED: February 13, 2025

Respectfully Submitted,

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3 **GUINASSO LAW LTD.**

WOMBLE BOND DICKINSON (US) LLP

4 /s/ Jason D. Guinasso

/s/ Ogonna M. Brown

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9 **NATIONAL CENTER ON SEXUAL
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SHAC MT LLC

16 *Admitted Pro Hac Vice

17 Counsel for Plaintiffs

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20 IT IS SO ORDERED:

21 Dated: February 24, 2025



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23 ANDREW P. GORDON
CHIEF UNITED STATES DISTRICT JUDGE